

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)
Terry Carter and) CASE NO: 11-01300-AJM-13
Tina Carter)
DEBTOR(S).)

**MOTION FOR EXTENSION OF TIME FOR
DEBTORS' COUNSEL TO FILE AMENDED CHAPTER 13 PLAN**

Comes now Debtors, by counsel, and in support of this Motion for Extension of Time to file Amended Chapter 13 Plan, states the following:

1. On February 14, 2011, Debtors filed a voluntary petition under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. A hearing on the Objection to Confirmation was held on April 29, 2011. The Court ordered Debtors' Counsel to submit an amended plan within 28 days.
3. Santander Consumer USA Inc., f/k/a Drive Financial Services ("Creditor") filed an objection to the confirmation of plan which is set for hearing on July 27, 2011 at 1:45 pm.
4. Debtors' request an Order granting additional time to allow Debtors' Counsel to resolve the objection to the confirmation of plan filed by Creditor and file an amended chapter 13 plan.

WHEREFORE, Debtors respectfully requests additional time to allow for Debtors' Counsel to submit required amended Chapter 13 Plan and for all other relief just and proper in the premises.

By: /s/ Mark S. Zuckerberg
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the foregoing pleading was served upon the following by electronic mail, this 21st day of July 2011:

US Trustee

Ann M. DeLaney, Chapter 13 Trustee

By: /s/ Mark S. Zuckerberg
Mark S. Zuckerberg #13815-49